Before the Federal Communications Commission
Washington D.C. 20554

In the Matter of	Public Comments filed by:
IN RE: DELETE, DELETE, DELETE	Dannie R. Jackson 130 N Laurel St, Pineville, Kentucky 40977
GN Docket No. 25-133	
DA 25-219	March 15, 2025
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Dear Secretary, Federal Communications Commission

My name is Dannie Jackson and I want to address the comments of "Marketplace and technological changes" page 3, GN Docket No. 25-133 DA 25-219 titled: "IN RE: DELETE, DELETE, DELETE" Released: March 12, 2025. Wherein, there are various regulations in existence that no longer reflect the current state of the art in technology.

Furthermore, as mentioned on page one: "47 U.S.C. § 163 (directing the Commission periodically to assess the state of the communications marketplace and, among other things, determine whether regulations or regulatory practices “pose a barrier to competitive entry into the communications marketplace or to the competitive expansion of existing providers of communications services,” including particularly in the case of “entrepreneurs and other small businesses”);..."

I want to look at several cases of means to provide for competitive entry into the communications marketplace, which can also stimulate innovations and forge a new frontier forward for the general public. Furthermore, the ideas I present here, will address other issues that exist in terms of fair and balanced information services, by opening up the market for new concepts in radio communications.

My first example deals with the present state of existing regulations that are currently outdated due to advancements in technology, and other bands being create for such use, which have left certain bands in disuse and thus relegated to the domain of being idle. A case in question is the 43.720 MHz to 49.990 MHz Cordless Phone band, which came to be disused as such devices moved to the 900 MHz band and now higher bands, which include current baby monitors. Wherein this band consist of 6.27 MHz of bandwidth, that can accommodate up to 627 channels with a channel bandwidth of +/- 5 kHz for two-way communications and private public broadcasting use. Wherein, making this offering to the public will make various special interest happy to say the least. Particularly hobbyist interested in radio broadcasting.

In recent times, there has been an interest in creating a low powered AM service on the Mediumwave broadcasting band of from 1 to 50-watt class of licensed stations, for use in the rural band segments of from 1600 to 1710 kHz. However, this has not gone well for those who advocated such, mostly due to corporate interest wanting to make this into a commercial for-profit vision, instead of the vision of such being used for no commercial private home-based broadcast stations. Or for rural broadcasting in places where there are no local radio stations.

In this commentary I want to propose that portions of the 43.720 MHz to 49.990 MHz (6.27 MHz wide band) be reallocated for such a purpose. By splitting the band into two 3.135 MHz portions, wherein the first portion is devoted to two-way communications of the AM, SSB and FM kinds, including emerging technology use for the transfer of files and graphics within a 500 kHz portion of the lower band where digital communications can be developed by open source means. Leaving the upper 3.135 MHz portion for low powered AM broadcasting in the power range of from 1 to 5 watts, for home spun radio stations interested in broadcasting music, as well as local news and weather broadcasting, including home spun talk shows, and or the rebroadcasting of podcast and other non-network-based streams. This in turn would remove the barriers to competitive entry into the communications marketplace with regards to 47 U.S.C. § 163. Specifically, the statement from page 1 of the aforementioned document "..determines whether regulations or regulatory practices “pose a barrier to competitive entry into the communications marketplace or to the competitive expansion of existing providers of communications services,” including particularly in the case of “entrepreneurs and other small businesses”);..."

It should be noted that because of the diversity of the kinds of broadcast that the public can engage in providing, will in now wise compete with the local licensed AM and FM broadcast stations. Furthermore, to make this a fair offering to the public, no corporate interest should be allowed to use this band, to carry network produced media content, and hence corporate entities are not allowed to use the private public airwaves. Private meaning, home based and hence home spun content. Whereas, with the suggested power levels for this service, it would be on not interest to corporate entities.

What I propose here would be of interest to “entrepreneurs and other small businesses” who would make good use of this suggestion, for learning about radio broadcasting techniques, as well as provide an incentive for small business manufacturers to come into the market to provide technology for this suggested service. In turn, this proposed service can inspire people move forwards into the AM Mediumwave and FM broadcasting marketplace. Once they have had a taste of what could be called hobby radio broadcasting.

In making an offering such as this to the public, which would bar this service being used by corporate entities, this would resolve the long-standing complaint about not having a low powered AM broadcasting service on the Mediumwave band. Where, in this suggestion, this unused band would not represent competition to either the Mediumwave nor the FM broadcast bands. And furthermore, if the maximum carrier level of this suggested service does not exceed let's say 5 watts, then this reduces the amount of interference that stations can cause to over the horizon stations at a radius of about 30 miles.

Furthermore, since I suggest that there be 300 channels for use in this service, the likelihood of stations interfering with one another in a region is greatly reduced by design. Furthermore, stations must accept interference with one another within their fringe areas. Hence, I suggest this as a public offering, which does not require licensing, but must utilize state of the art type accepted equipment licensed by design.

Currently shortwave broadcast stations utilize an audio modulation bandwidth of 5 kHz which works well for them, even with the broadcasting of music-based material. Hence, suggesting that the channel be spaced every 10 kHz would allow for the same modulation bandwidth of +/- 5 kHz for each sideband of an AM modulated broadcast signal.

Furthermore, in terms of type acceptance, a transmitter operating in the upper 3.135 MHz portion of this band under question, must be such that it makes use of modulation peak detection and sampling of the positive modulation peaks for modulation level control, as well as make use of negative modulation peak level control, such as is the case with current AM Mediumwave station equipment that utilizes asymmetrical modulation to adjust the negative modulation peaks so that they do not clip. Op Amp audio bandpass filters must also be used to limit the audio modulation bandpass to the desired modulation bandwidth specifications. And such a transmitter must provide a low pass filter for the output, that is consistent with at least an amateur radio low pass filter in terms of specifications of harmonic attenuation.

For those interested in broadcasting. The transmitter for use on the upper 3.135 MHz portion of this band in question, must be a separate dedicated transmitter, whereas the transceiver for use in this band segment by those interested in two-way communications, can only transmit on the lower portion of the band, while its receiver section can tune up into the broadcast portion. In addition to this, dedicated receivers for use to receive the broadcast portion of this band, can be produced. Hence, this would lead to new products and innovations using the current state of the art in electronics.

Since, everyone it seems has an interest in spectrum, making this offer to the public, will resolve a long-standing issue with those interested in low powered AM broadcasting, once and for all.

11 Meter Broadcast Band

The 11-meter broadcast band of from 25.670 MHz to 26.100 MHz tends not to be used except during those years of the solar cycle peaks, when propagation allows for long distance communications. This band can be put to better use, in terms of licensed broadcast stations of the 200-watt class, for the broadcasting of DRM signals. Which would make this an interesting broadcasting venture for privately licensed stations, which would not allow for corporate network licenses to be purchased. Furthermore, expanding the band to 26.670 MHz would allow for the entry of more stations. Also, interference must be allowed due to several stations coming into the marketplace. In this scheme two stations per state can be accommodated. With the use of DRM as the broadcasting method, such signals can be heard quite well against background noise, down to the 200-watt power level, however, 500 to 1000 watts can be considered. Furthermore, more stations can be added, if they use yagi beam antennas, with a specified target region that would minimize interference to other stations on the same frequency.

Currently because of the existence of low cost SDR or rather software defined radio hardware, there exist an increased base of HF shortwave radio listeners, which also make use of DRM receiver software for the demodulation of DRM broadcast signals. Hence, there already exist a market for DRM capable radio devices.

Also, to be more consistent with International Radio in general, the 11 Meter CB radio band could be extended down to 26.680 MHz in order to provide nearly the same channel coverage as other nations presently provide for CB radio use.

43.720 MHz to 49.990 MHz Cordless Phone Band

To recap the comments regarding re-purposing the 43.720 MHz to 49.990 MHz spectrum. wherein I suggested a carrier level of up to 5 watts, with such things as Op Amp audio modulation filters, along with asymmetrical audio modulation techniques being used to prevent negative peak clipping. And a professional level, low pass output filter. I should also suggest that the antennas for use for the suggested broadcast portion of the band, be no higher than 1 wavelength at the feed point, and that they be vertical radiators, however a four element yagi beam antenna may be used to target an area, but for the purpose of preventing interference to other stations if required. The beam antenna then would be used to turn the transmission away from the other station towards an area that will not cause interference.

Now the reasons for not allowing corporate licensed use of this band, means that licenses would not be snatched up across the nation, leaving this band for use by mom and pop sorts of entities. Now, it can be used for commercial advertising by local advertisers who want to support the efforts of station owners, and to help them with such things as labor, since labor is time, and time should mean money to those who must make up for the time involved. Being that no one can expend much time on something that does not have something to provide in return.

Certain rules must apply such as that no non type accepted equipment may be used, and that no one can exceed the power limitations for such stations. Also it must be in the public interest, in that it makes mention of such things as local weather alerts, and that no broadcaster may use profanity on the airwaves. All stations must provide their audience with an email address for public comments to the station. Also, no station may use their platform to make terroristic threats against anyone anywhere. Nor may the station’s platform be used to suggest such things as riots. Free speech will not be penalized so long as one does not make use of such to make public threats nor to suggest such. Hence, those who broadcast must abide by a reasonable set of rules and specifications.

A station will be allowed to broadcast music, and non network talk shows taken from online streaming sources.

Every station must have on hand a copy of the rules and specifications for use of the band.

Thank you for reading my comments.

Dannie R Jackson